

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

XIAOYUAN ZHANG, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

VALARIS PLC, THOMAS P. BURKE, and
JONATHAN H. BAKSHT,

Defendants.

Case No. 1:19-cv-07816-NRB

NOTICE OF NON-OPPOSITION OF RAJIV H. BHUVA TO COMPETING MOTIONS
FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

On October 21, 2019, Rajiv H. Bhuva (“Bhuva”) filed a motion, pursuant to Section 21D(a)(3) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3), as amended by the Private Securities Litigation Reform Act of 1995, for an Order: (1) appointing Bhuva as Lead Plaintiff in the above-captioned action on behalf of all persons who purchased or otherwise acquired the securities of Valaris plc between April 11, 2019 and July 31, 2019, both dates inclusive; and (2) approving proposed Lead Plaintiff’s selection of Pomerantz LLP as Lead Counsel for the Class. Dkt. No. 14.

Having reviewed the competing motions before the Court, Bhuva does not appear to have the largest financial interest in this litigation within the meaning of the PSLRA. This notice of non-opposition shall have no impact on Bhuva’s membership in the proposed class or his right to share in any recovery obtained for the benefit of class members.

Dated: November 1, 2019

Respectfully submitted,

POMERANTZ LLP

/s/ Jeremy A. Lieberman

Jeremy A. Lieberman

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